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21 *Co-Lead Counsel for Plaintiffs*

22 UNITED STATES DISTRICT COURT

23 OF NORTHERN DISTRICT OF CALIFORNIA

24 SAN FRANCISCO DIVISION

25 IN RE: UBER TECHNOLOGIES, INC.,
26 PASSENGER SEXUAL ASSAULT
27 LITIGATION

No. 3:23-md-03084-CRB

**DECLARATION OF ELLYN H. HURD IN
SUPPORT OF PLAINTIFFS' MOTION TO
EXCLUDE EXPERT TESTIMONY**

28 This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
No. 23-cv-06708

DECLARATION OF ELLYN H. HURD

I, Ellyn H. Hurd, declare as follows:

1. I am a partner of Simmons Hanly Conroy, LLP, an attorney licensed in the State of Massachusetts, and duly admitted to practice before this Court *pro hac vice*, representing Plaintiffs in the above caption action. I have personal knowledge of the following facts, and, if called as a witness, I could and would testify competently thereto.

2. Attached hereto as **Exhibit A** is a true and correct copy of the expert report of Joseph Okpaku dated September 26, 2025.

3. Attached hereto as **Exhibit B** is a true and correct copy of the deposition of Joseph Okpaku dated November 5, 2025.

4. Attached hereto as **Exhibit C** is a true and correct copy of the expert report of Vida Thomas dated September 26, 2025.

5. Attached hereto as **Exhibit D** is a true and correct copy of the expert report of Jason Morris dated September 26, 2025.

6. Attached hereto as **Exhibit E** is a true and correct copy of the expert rebuttal report of Jason Morris dated October 24, 2025.

7. Attached hereto as **Exhibit F** is a true and correct copy of the expert report of Eric Piza dated September 26, 2025.

8. Attached hereto as **Exhibit G** is a true and correct copy of the deposition of Eric Piza dated October 30, 2025.

9. Attached hereto as **Exhibit H** is a true and correct copy of the expert rebuttal report of Christopher Wilson dated October 24, 2025.

10. Attached hereto as **Exhibit I** is a true and correct copy of the expert report of Vicotira Stodden dated September 26, 2025.

11. Attached hereto as **Exhibit J** is a true and correct copy of the expert rebuttal report of Victoria Stodden dated October 24, 2025.

12. Attached hereto as **Exhibit K** is a true and correct copy of the deposition of Victoria Stodden dated October 21, 2025, and Exhibit 2073 to the deposition of Victoria Stodden.

